

# EXHIBIT 1

## McCombs, Katelyn

---

**From:** Simpson, Kathryn <ksimpson@mette.com>  
**Sent:** Tuesday, February 11, 2025 3:25 PM  
**To:** McCombs, Katelyn  
**Cc:** Phillis, Mark T.  
**Subject:** RE: Blough v. BCD - Production of Plaintiff's Cell Phone

You are correct – texts and photos and metadata. You will get it in RSMF.

**Kathryn Lease Simpson**  
Managing Partner



3401 North Front Street, P.O. Box 5950, Harrisburg, PA 17110-0950

T: (717) 231-5221 (direct)  
C: (717) 503-4684  
E: [ksimpson@mette.com](mailto:ksimpson@mette.com)  
W: [www.mette.com](http://www.mette.com)

---

**From:** McCombs, Katelyn <KMcCombs@littler.com>  
**Sent:** Tuesday, February 11, 2025 1:32 PM  
**To:** Simpson, Kathryn <ksimpson@mette.com>  
**Cc:** Phillis, Mark T. <MPhillis@littler.com>  
**Subject:** RE: Blough v. BCD - Production of Plaintiff's Cell Phone

Thanks, Kathi. Can you please clarify what “report” you are anticipating below? Based on the attached correspondence and the Court’s Order that Plaintiff produce the “contents” of her cell phone, we understand that Plaintiff will be producing text messages and photos.

Additionally, as a reminder, we ask that Bit-x-Bit extract the text messages to be produced in RSMF (Relativity Short Message Format) and photos be produced with all associated metadata.

Thanks,  
Katelyn

**Katelyn McCombs**  
Attorney at Law  
412.201.7641 direct, 704.433.7078 mobile, 412.774.2296 fax  
[KMcCombs@littler.com](mailto:KMcCombs@littler.com)

Pronouns: She/Her



Fueled by Ingenuity. Inspired by you.

Labor & Employment Law Solutions | Local Everywhere  
One PPG Place, Suite 2400, Pittsburgh, PA 15222

---

**From:** Simpson, Kathryn <[klsimpson@mette.com](mailto:klsimpson@mette.com)>  
**Sent:** Tuesday, February 11, 2025 12:28 PM  
**To:** McCombs, Katelyn <[KMcCombs@littler.com](mailto:KMcCombs@littler.com)>  
**Subject:** Blough v. BCD - Production of Plaintiff's Cell Phone

**[EXTERNAL E-MAIL]**

Hi Katelyn. The data extraction from my client's phone is scheduled for 2/20. The vendor expects, barring any unforeseen issues, that the report will be done by the next day. Take care,

Kathi

**Kathryn Lease Simpson**  
Managing Partner



3401 North Front Street, P.O. Box 5950, Harrisburg, PA 17110-0950

T: (717) 231-5221 (direct)  
C: (717) 503-4684  
E: [klsimpson@mette.com](mailto:klsimpson@mette.com)  
W: [www.mette.com](http://www.mette.com)

-----  
This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message.

Littler Mendelson, P.C. is part of the international legal practice Littler Global, which operates worldwide through a number of separate legal entities.